

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PRINCIPLE SOLUTIONS GROUP,)	
LLC,)	
)	CIVIL ACTION FILE NUMBER:
Plaintiff,)	
)	_____
v.)	
)	
IRONSHORE INDEMNITY, INC.,)	
)	
Defendant.)	

NOTICE OF REMOVAL

COMES NOW Ironshore Indemnity, Inc. (“Ironshore”), defendant in the above-styled civil action, and pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, files this Notice of Removal and respectfully shows the Court the following:

1.

On or about October 20, 2015, Plaintiff filed this action against Ironshore in the Superior Court of Fulton County, State of Georgia, entitled Principle Solutions Group, LLC v. Ironshore Indemnity, Inc., Civil Action File Number 2015CV267187.

2.

Ironshore was served with a copy of the summons and complaint on November 6, 2015. See Ex. A, Sheriff’s Entry of Service.

3.

All process, pleadings and orders served on Ironshore are attached hereto as Exhibit B.

4.

This Notice of Removal has been timely filed within thirty days after the complaint was served on Ironshore.

5.

Plaintiff Principle Solutions Group, LLC states that it is a Georgia corporation with its principal place of business in Atlanta, Georgia.

6.

Ironshore is a Minnesota company with its principal place of business in New York.

7.

There is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000 (Compl., ¶¶ 3, 42, 78), which satisfies the requirements for removal jurisdiction. 28 U.S.C. § 1332(a).

8.

Pursuant to 28 U.S.C. § 90(a)(2), the United States District Court for the Northern District of Georgia, Atlanta Division, is the district court having

jurisdiction over the geographical area where the state court action is pending. Pursuant to 28 U.S.C. § 1446(a), Ironshore is entitled to remove this action from the Superior Court of Fulton County, Georgia.

9.

Ironshore has provided written notice of its filing of this Notice of Removal to Plaintiff and the Clerk of Court for the Superior Court of Fulton County, a copy of which is attached hereto as Exhibit C.

WHEREFORE, Ironshore respectfully requests that the Court assume full jurisdiction of the controversy now pending between Plaintiff and Ironshore in the Superior Court of Fulton County as provided by law.

FREEMAN MATHIS & GARY, LLP

/s/ Philip W. Savrin

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing NOTICE OF REMOVAL to the Clerk of Court using the CM/ECF system and mailed by United States Postal Service, first-class, postage prepaid, a paper copy of the same document to counsel of record who are non-CM/ECF participants.

Counsel of record is:

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[SIGNATURE APPEARS ON THE FOLLOWING PAGE]

This 25th day of November, 2015.

/s/ Philip W. Savrin

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